

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

DASHBOARD COMPUTING LLC,)	
)	
Plaintiff,)	
)	Civil Action No. _____
v.)	
)	JURY TRIAL DEMANDED
CIMPRESS USA INCORPORATED,)	
)	
Defendant.)	
_____)	

COMPLAINT

For its Complaint, Plaintiff Dashboard Computing LLC ("Dashboard Computing"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Dashboard Computing is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.
2. Defendant Cimpres USA Incorporated is a Delaware corporation with, upon information and belief, a place of business located at 275 Wyman Street, Waltham, Massachusetts 02451.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
5. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses

of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

6. Venue is proper in this district pursuant to §§ 1391(b), (c) and 1400(b).

THE PATENT-IN-SUIT

7. On June 27, 1998, United States Patent No. 6,222,543 (the "'543 patent"), entitled "Method And Apparatus For Attaching Navigational History Information To Universal Resource Locator Links On A World Wide Web Page," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '543 patent is attached hereto as Exhibit A.

8. Dashboard Computing is the assignee and owner of the right, title and interest in and to the '543 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,222,543

9. Dashboard Computing repeats and realleges the allegations of paragraphs 1 through 8 as if fully set forth herein.

10. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 8 of the '543 patent by making, using, importing, offering for sale, and/or selling a computer implemented method and system for organization and presentation of visual information on a computer display screen, including, but not limited to, methods and systems used to operate www.vistaprint.com.

11. Dashboard Computing is entitled to recover from Defendant the damages sustained by Dashboard Computing as a result of Defendant's infringement of the '543 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Dashboard Computing hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Dashboard Computing requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '543 patent;
- B. An award of damages to be paid by Defendant adequate to compensate Dashboard Computing for Defendant's past infringement of the '543 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial; and
- C. An award to Dashboard Computing of such further relief at law or in equity as the Court deems just and proper.

Dated: November 30, 2015

/s/Andrew W. Spangler

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